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1 2 3 4 5 6 7	MALCOLM A. HEINICKE (SBN 194174) REBECCA GOSE LYNCH (SBN 230078) MUNGER, TOLLES & OLSON LLP 560 Mission Street Twenty-Seventh Floor San Francisco, CA 94105-2907 Telephone: (415) 512-4000 Facsimile: (415) 512-4077 Malcolm.Heinicke@mto.com  Attorneys for Defendants BROADSPIRE SERVICES, INC. AND PLATINUM EQUITY LLC		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11			
12	PHILIP K. CONLEY, an individual,	CASE NO. C 05-02249 MJJ	
13	Plaintiff,	STIPULATION AND [PROPOSED] ORDER CONTINUING CASE	
14	vs.	MANAGEMENT CONFERENCE AND ASSOCIATED DEADLINES	
15 16 17 18	KEMPER INSURANCE COMPANIES, an Illinois Corporation; BROADSPIRE SERVICES, INC., a Delaware Corporation, aka Broadspire Management Services; PLATINUM EQUITY LLC, Delaware Limited Liability Company; DOES 1-100, inclusive,	Current Date: September 20, 2005 at 2:00 p.m. Proposed Date: October 18, 2005 at 2:00 p.m.  The Honorable Martin J. Jenkins	
19	Defendants.		
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28		STIPULATION AND ORDER CONTINUING	
	   1123848.1	CASE MANAGEMENT CONFERENCE –	

C 05-02249 MJJ

1123848.1

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1	WHEREAS, the Court has scheduled a Case Management Conference for this
2	matter on September 20, 2005 at 2:00 p.m., and the Court has also set other initial case
3	management deadlines in association with this date;
4	WHEREAS, lead trial counsel for Defendants Broadspire and Platinum Equity wil
5	be unable to attend the September 20, 2005 Case Management Conference due to existing and
6	long-standing travel plans;
7	WHEREAS, the Plaintiff's motion to remand the case to state court has been
8	argued and submitted, but the Court has not yet issued an order on that motion;
9	WHEREAS, the parties have met and conferred on the continuance of certain case
10	management deadlines and stipulate to the entry of an order to the following effect through their
11	counsel of record:
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	STIPLII ATION AND ORDER CONTINUING

## Casce 3:05:05-02:2022:40JJJD Document n 4:547 Filed 1009/09/2020 5 Page 3:05 5

1	IT IS HEREBY STIPULATED that (1) the Case Management Conference		
2	currently scheduled for September 20, 2005 at 2:00 p.m. is hereby continued until October 18,		
3	2005 at 2:00 p.m.; (2) the parties shall file a joint Case Management Conference Statement no		
4	later than October 7, 2005; (3) the parties shall meet and confer on early settlement and discovery		
5	issues prior to October 7, 2005; and (4) the parties shall complete initial disclosures by October 7,		
6	2005 or at such other time as mutually agreed.		
7		Respectfully submitted,	
8			
9	DATED: September, 2005	LAW OFFICES OF PHYLLIS E. ANDELIN PHYLLIS E. ANDELIN	
10		By:	
11		By:  PHYLLIS E. ANDELIN  Attorneys for Plaintiff PHILIP K. CONLEY	
12	DATED: Soutombon 2005	MECKLER BULGER & TILSON, LLP	
13	DATED: September, 2005	BOORNAZIAN, JENSEN & GARTHE	
14		By:	
15		Attorneys for Defendant	
16		KEMPÉR INSURANCE COMPANIES	
17	DATED: September, 2005	MUNGER, TOLLES & OLSON LLP MALCOLM A. HEINICKE	
18		REBECCA GOSE LYNCH	
19		By: ///////	
20		MALCOLM'A. HEINICKE	
21		Attorneys for Defendants BROADSPIRE SERVICES, INC. AND	
22		PLATINUM EQUITY LLC	
23	***	******	
24	PURSUANT TO STIPULATION, IT IS SO ORDERED		
25		Marin of Jeneire	
26	Dated: 9/12/2005	The Honorable Martin J. Jenkins	
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28			

STIPULATION AND ORDER CONTINUING CASE MANAGEMENT CONFERENCE – C 05-02249 MJJ

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1	IT IS HEREBY STIPULATED that (1) the Case Management Conference		
2	currently scheduled for September 20, 2005 at 2:00 p.m. is hereby continued until Ocubber 18,		
3	2005 at 2:00 p.m.; (2) the parties shall file a joint Case Management Conference Statement no		
4	later than October 7, 2005; (3) the parties shall meet and confer on early settlement and discovery		
5	issues prior to October 7, 2005; and (4) the parties shall complete initial disclosures by October 7		
6	2005 or at such other time as mutually agreed.		
7	Respectfully submitted,		
8	DATED: September 5, 2005 LAW OFFICES OF PHYLLIS E. ANDELIN		
9	DATED: September, 2005 LAW OFFICES OF PHYLLIS E. ANDELIN		
10	By: Phylis Anollin		
11	PHYLLIS E. ANDELIN Attorneys for Plaintiff		
12	PHILIP K. CONLEY		
13	DATED: September, 2005 MECKLER BULGER & TILSON, LLP BOORNAZIAN, JENSEN & GARTHE		
14	Drn		
15	By:		
16	Attorneys for Defendant KEMPER INSURANCE COMPANIES		
17	DATED: September 6 , 2005 MUNGER, TOLLES & OLSON LIP MALCOLM A, HEINICKE		
18	REBECCA GOSE LYNCH		
19	By: Mach A		
20	MALCOLM'A. HEINICKE		
21	Attorneys for Defendants BROADSPIRE SERVICES, INC. AND		
22	PLATINUM EQUITY LLC		
23	**************************************		
24			
25	· ·		
26	Dated: The Honorable Martin J. Jenkins		
27			
28			
	STIPULATION AND ORDER CONTINUING  1123848.)  - 3 - CASE MANAGEMENT CONFERENCE — C 05-02249 MJJ		

- 11			
1	IT IS HEREBY STIPULATED that (1) the Case Management Conference		
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4	later than October 7, 2005; (3) the parties shall meet and confer on early settlement and discovery		
5	issues prior to October 7, 2005; and (4) the parties shall complete initial disclosures by October 7,		
6	2005 or at such other time as mutually agree	ed.	
7		Respectfully submitted,	
8			
9	DATED: September, 2005	LAW OFFICES OF PHYLLIS E. ANDELIN PHYLLIS E. ANDELIN	
10		By:	
11		PHYLLIS E. ANDELIN Attorneys for Plaintiff	
12	$\partial$	PHILIP K. CONLEY	
13	DATED: September, 2005	MECKLER BULGER & TILSON, LLP BOORNAZIAN, JENSEN & GARTHE	
14		By: Mylly M, 1C3	
15			
16		Attorneys for Defendant KEMPER INSURANCE COMPANIES	
17	DATED: September, 2005	MUNGER, TOLLES & OLSON LLP MALCOLM A. HEINICKE	
18		REBECCA GOSE LYNCH	
19		Ву:	
20		MALCOLM A. HEINICKE	
21		Attorneys for Defendants BROADSPIRE SERVICES, INC. AND	
22		PLATINUM EQUITY LLC	
23	+ * * *	****	
24	PURSUANT TO STIPULATION, IT IS SO ORDERED		
25			
26	Dated:	The Honorable Martin J. Jenkins	
27			
28			
	1123848.1	STIPULATION AND ORDER CONTINUING  - 3 - CASE MANAGEMENT CONFERENCE -  C. 05-02249 MJJ	